

**BEFORE THE WASHINGTON  
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

Puget Sound Energy

Respondent.

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DOCKETS UE-220066, UG-220067, and UG-210918 (*Consolidated*)

**COREY J. DAHL  
ON BEHALF OF THE  
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL  
PUBLIC COUNSEL UNIT**

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**EXHIBIT CJD-10**

Puget Sound Energy Response to WUTC Staff Data Request No. 313

**December 8, 2023**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Dockets UE-220066 & UG-220067  
Puget Sound Energy  
2022 General Rate Case**

**WUTC STAFF DATA REQUEST NO. 313:**

REQUESTED BY: Jacque Hawkins-Jones

**RE: PSE Petition to Amend Final Order**

Has PSE performed an equity analysis to evaluate the impacts of the requested amendment to Order 24? If so, please provide a copy of the analysis. If not, please explain why PSE has not done so.

**Response:**

No, Puget Sound Energy (“PSE”) has not performed an equity analysis to evaluate the impacts of the requested amendment to Order 24 because the requested amendment to Order 24 does not have any immediate equity impacts. Rather, any impacts will be determined by the actions PSE takes following a final order by the Commission, which in turn rely on a settlement agreement, if any, the parties may propose to the Commission.

PSE uses a four-part framework for assessing the equity impacts and energy justice of a given action. This approach includes recognition, procedural, distributional, and restorative justice components. PSE has compiled data related to recognition and distributional justice by examining the count and proportion of customers with past-due accounts with various vulnerability characteristics. Table 1 below illustrates this data. PSE considered three thresholds of past-due amount and determined how many customers with past-due amounts above those thresholds have a given vulnerability characteristic. PSE plans to expand its equity analysis by augmenting these data with procedural and restorative justice analyses.

Table 1: Equity Characteristics of Customers with Past-due Balances\*

Past-Due Threshold	> \$1	> \$70	> \$125	Percentage in Total Customer Base with Vulnerability Characteristic
<b>Total Number of Customers with Past-Due Accounts</b>	<b>268,480</b>	<b>194,388</b>	<b>155,511</b>	
Highly Impacted Community (“HIC”)	90,429 (33.7%)	68,325 (35.1%)	55,660 (35.8%)	30%
High Vulnerability Population	127,107 (47.3%)	95,564 (49.2%)	77,639 (49.9%)	33%
Known Low-Income	11,831 (4.4%)	10,473 (5.4%)	9,346 (6.0%)	3.5%
Estimated Low-Income	123,692 (46.1%)	95,028 (48.9%)	78,170 (50.3%)	46%
Energy-Burdened**	48,065 (17.9%)	39,282 (20.2%)	33,812 (21.7%)	16%
* Please note that the data overlaps between and among the various vulnerability characteristics. The percentages shown (for vulnerability characteristics) indicate a percentage of the Total Number of Customers with Past-Due Accounts, for each Past-Due Threshold. **Note Energy-Burdened here includes non-low-income customers.				